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*Mivne Real Estate (K.D.) Ltd., Darban Investments Ltd.,
Mirland Development PLC, Muse Holdings Ltd., Tova Fishman,
and Fishman Holdings North America, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

APPLICATION OF JOSEPH BENKEL, ADV.
FOR THE ASSETS OF THE BANKRUPT, MR.
ELIEZER FISHMAN I.D. NO. 030302657 FOR
AN ORDER TO TAKE DISCOVERY
PURSUANT TO 28 U.S.C. § 1782,

Applicant.

Case No.: 1:20-mc-00248-PAE

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Daniel Rubel, dated October 29, 2020, Declaration of David Zvida dated October 29, 2020, Declaration of Roman Rozental dated October 28, 2020, Declaration of Anat Menipaz dated October 29, 2020, Declaration of Ohad Shapira dated October 28, 2020, Declaration of Tova Fishman dated October 29, 2020, Declaration of Achiad Harel dated October 28, 2020, Declaration of Theodore Metzger dated October 29, 2020, and the Memorandum of Law, dated October 29, 2020, Tova Fishman (“Ms. Fishman”), Mivne Real Estate (K.D.) Ltd. (“Mivne”), Darban Investments Ltd. (“Darban”), Mirland Development PLC (“Mirland”), Muse Holdings Ltd. (“Muse”), and Fishman Holdings North America, Inc. (“Fishman Holdings,” and collectively, the

“Intervenors”), by and through their counsel, move this Court before the Honorable Paul A. Engelmayer, at the United States District Court, 40 Foley Square, New York, New York for an Order permitting Intervenors to intervene in Joseph Benkel, Adv.’s Application for Discovery pursuant to 28 U.S.C. § 1782 (the “Petition”) and upon intervention denying the Petition in its entirety.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits and answering memoranda shall be served within the time provided by Local Civil Rule 6.1.

Dated: New York, New York
October 29, 2020

ZEICHNER ELLMAN & KRAUSE LLP

By: /s/Stuart A. Krause
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